



Response by the Marine Renewables Industry Association to the Consultation:

*Draft Offshore Renewable Energy Future Framework Policy Statement 2024*

26 February 2024

## INTRODUCTION

The Marine Renewables Industry Association (MRIA) welcomes the opportunity to comment on the *Draft Offshore Renewable Energy Future Framework Policy Statement 2024* (referred to hereunder as the 'Framework' for the sake of brevity) and acknowledges the commitment required of officials to prepare it. Our comments below are intended, therefore, to contribute positively to the vital task of mapping out our Offshore Renewable Energy (ORE) future.

In summary, we have concerns under four headings.

First, the Framework lacks 'maturity' and we have recommended to the Department orally that the planned announcement of this and other policies at the *Wind Europe Conference* in March may be premature and it would be of great benefit to both policy makers and industry if further time were given to it and, indeed, to the other, related, policy documents under development at present. The key issue is that the Framework is not a plan, it lacks firm decisions and timelines. MRIA welcomes the recent indication that there may be an Action in the final version of the Framework to establish a joint industry: DECC working party to support decision-making and implementation. We welcome too the suggestion that a competitive MAC process will be developed. We note, however, that no timeline has been given in the Framework for when this will occur or what models are being considered by the Department. Once DMAPs are identifying, allocating candidate development areas or seabed is the critical next step. Once seabed is awarded, developers can begin early-stage development works and begin preparations for route to market auctions. Such an approach is needed to account for project attrition and to ensure Ireland is well placed to meet its 2040 targets.

Second, there is a need for policy alignment between the Framework, the Industrial Strategy and the SEAI led Roadmap – the Chairman of MRIA has been given the opportunity to read drafts of all three Papers. In addition, these policy elements need to be tied into other issues under consideration or already dealt with including renewable hydrogen development, 'private wires' policy, transmission strategy and identification of future DMAPs, including timelines. A much greater impact – particularly with international investors who are critical to both supply chain development and to project development – would be achieved with one, integrated policy document containing firm decisions and timelines.

Third, our ultimate ORE target– whether it ends up at 37GW or 50GW by 2050 – will require Floating Offshore Wind (hereafter, 'Floating'). The Framework in draft form does not

facilitate Floating with no indications about initial location (an extended South Coast DMAP? A West Coast DMAP?), no clarity about appropriate support under a revised ORESS regime and lack of information about a proposed Floating ‘demonstrator’. A ‘stepping stone’ project of adequate scale - see later - is needed as a demonstrator to attract attention from the market.

Finally, R&D, particularly in the emerging technologies of Wave and Tidal, is a key, inter alia to attracting and retaining engineering talent to Ireland, and, therefore, to the supply chain needed to support *Offshore Wind*. The provisions for R&D in the various draft policies - Framework/ Roadmap/ Industrial Strategy - are unsatisfactory, confusing, and responsibility for execution is spread out between too many State bodies. *A contributor to this situation is the confinement of the Industrial Strategy to Offshore Wind, which is largely a mature technology and where, therefore, there is limited scope for Irish R&D.* Among the various drafts are conclusions e.g. that Ireland give attention to research in synthetic rope (we are unaware of any research interest in this field) and tidal barrage (no interest or opportunity in Ireland) that are unsatisfactory.

In the meantime, Irish engineers are world leading in research and project development globally (e.g., three Irish companies are currently working on projects in Wave and Tidal with their international prize money aggregated at €60m) but generally outside the scope of local, Irish support; Irish engineers are on most of the working groups of the IEC<sup>1</sup> which sets the international standards for these technologies; and Irish company leaders have scooped the Ocean Energy Person of the Year for the past two years. We suggest that R&D policy should be abstracted from the Framework etc and dealt with, after consultation with the research and industrial communities, in a separate Paper later this year. We welcome the recent indication that there may be an Action in the final version of the Framework to establish a joint research community/ industry/DECC etc working party to support decision-making and implementation on R&D.

1(A) HAS THIS SECTION ADEQUATELY IDENTIFIED THE GENERAL KEY PRIORITIES FOR ORE DELIVERY IN IRELAND? ARE THERE ADDITIONAL PRIORITIES THAT SHOULD BE INTEGRATED INTO THE HOLISTIC, PLAN-LED APPROACH?

1(B) HAS EACH KEY PRIORITY BEEN ADEQUATELY DESCRIBED AND CONSIDERED ALL RELEVANT COMPONENTS? FOR EACH KEY PRIORITY PLEASE PROVIDE ANY ADDITIONAL CONCERNS, ASPECTS OR COMMENTARY FOR INCLUSION.

- MRIA endorses the view that protection of the environment is vital and that every effort should be made to provide for co-existence between ORE and all aspects of the environment.
- However, Marine Protected Areas (MPAs) legislation is reportedly imminent, and Offshore Renewable Energy (ORE) is concerned about the scope for confusion, delays etc if responsibility for decision-taking on designating Marine Protected Areas were to be assigned to a *new* body established under this legislation, a body separate to MARA.

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<sup>1</sup> International Electrotechnical Commission www. <https://www.iec.ch>

- We suggest that consideration be given to extending the remit of MARA to include MPA designation, perhaps treated in the final Framework as a commitment ‘...to review arrangements for managing and co-ordinating ORE plans and MPA plans’. This, of course, would pose a challenge to MARA which does not at present have all the skill sets to undertake this task. It will take time and an investment in extra specialist staff resources to enable MARA to become a suitable regulator of MPAs.
- The Framework at present is loose regarding ports. The final version should explain and emphasise the distinction between the provision of ports capacity for Phases 1 and 2 (Bottom Fixed wind) and the deepwater capacity needed for Floating Wind, beyond the early Phases (see (f) on p14 of the Framework). It should also be noted that the development of ports that can take vessels over 1350 tonnes require an EIA and would be outside the scope of Local Authorities as alluded to on page 24 / section 1.2.1.5. Moreover, the form of each O&M facility will have a bearing on the form of consenting required.
- The possible constraints associated with Belfast must be noted. First, the proximity of the City Airport to the docks will have an impact on (tall) Floating projects and there may be an issue with water depths (9.5 m in the Victoria Channel). The DI facility specifically built for Offshore Wind is now partly used as Belfast’s Cruise Ship Terminal (Belfast is one of the most important Cruise Ship calls in Europe with that trade largely confined to the summer, the key season for ORE work). Reportedly, the cruise trade will be moved to D3 to 2026.
- There are reports (unverified) that Belfast’s capacity will be tied up for several years ahead by a major UK project.
- The final Framework should commit to producing a comprehensive research policy to draw together the research strands in the Framework, the ORE Roadmap being finalised by SEAI and the Industrial Strategy – see the Introduction and 4(d) below.
- The Framework should refer to the Seafood ORE Working Group and the importance of harmonious co-existence between ORE, the State and Fishers.
- Industry is concerned about low staffing levels at NPWS, which has an important role to play in the ORE consenting process. It is noted that aquaculture licensing is not under the MAPA regime, hence limiting opportunities for co-existence and co-location between aquaculture and ORE.
- This staffing concern extends to the overall Department of Housing, Local Government and Heritage (DHLGH) as well. DHLGH hosts the Marine Environment Unit who are leading on implementation of the Marine Strategy Framework Directive, including Marine Protected Area legislation as well as various guidance documents relating to ORE such as that on underwater noise, and general environmental guidance (e.g. <https://apemgroup.com/aquafact-and-gobe-developing-environmental-guidelines-for-offshore-renewables-in-ireland/>). This is entirely separate from NPWS who deal only with EU and national nature conservation legislation (i.e. EU Birds and Habitats Directives, and Irish Wildlife Acts, as amended). Both areas are severely under-resourced.
- The final document needs to be more explicit about how DMAPs will be made for the best suitable place (technically) and lowest environmental risk (legally) and not

simply follow EirGrid's grid development process as (arguably) happened in the case of the South Coast DMAP and hence does nothing to improve public trust in any of these processes.

### 1(C) HOW BEST SHOULD THE 2GW OF NON-GRID LIMITED OFFSHORE WIND CAPACITY BE PROCURED?

- A consideration here is that, where relevant, the auction process should be used, with non-price-based criteria.
- The criteria selected should align with the objectives of other policies and targets, such as the Industrial Strategy, 2040 targets, etc.
- The auction process referred to, however, should include 'ring fenced' support (e.g., in ORESS) for the Floating demonstrator referred to in the Framework, for later demonstrators for other technologies and for small scale (<10MW) pilot projects in new technologies such as Wave and Tidal.
- A key to providing the 2GW is the likely availability of DMAPs, given the resource intensity of DMAP designation, notwithstanding the somewhat vaguely expressed intention in the Framework to identify future DMAP locations in the summer of 2024.
- Overall, a much greater level of certainty as regards the DMAP plan, and a competitive MAC process is needed as a key enabler to delivery of both grid and non-grid capacity in line with the 2 GW target linked to the State's sectoral emission ceilings and corresponding binding carbon budgets and indeed the North Seas Energy Cooperation long term plan. All-inclusive delivery dates should be laid down in line with the State's ORE targets trajectory to 2030, 2040 and 2050 accounting for likely project attrition.
- The final Framework should identify priority areas for the DMAPs e.g., a Floating demonstrator can only go in the South Celtic Sea, thus will require an amendment to the forthcoming South coast DMAP, or off the West coast (i.e., off the Shannon), thus requiring an entirely new DMAP – see the next paragraph also. AMETS has, of course, a role to play but possibly only for pilot, relatively small-scale projects. As a principle, non-grid and demonstrator projects should not a priori be confined to any one coast.
- We support the Actions in the Framework to consider a site specifically for Floating Offshore Wind. The capacity considered for the site should be in the order of 400MW-500MW, anything less than this may not attract attention from the market, particularly for delivery in the early-mid 2030s and result in diseconomies of scales. There should be the potential to expand the capacity within this dedicated DMAP area to attract future investment.
- The Climate Action Plan, Action EL/24/9 requires the development of a private wires policy framework in 2024 (following a public consultation process undertaken in 2023). Such a policy to facilitate hydrogen production constitutes a key enabling mechanism for hydrogen development proposals.
- In addition, there is a need to actively support the 'route to market' plans of candidate developers. In this regard, clarity by policy enablers relating to a demand route to market for non-grid capacity and the stated 2 GW target is required, given

that there now appears to be policy misalignment as regards delivery of this target between the provisions of the draft Framework, the National Hydrogen Strategy (Action 4) and the forthcoming Industrial Strategy for Offshore Wind (and which will not definitely address renewable hydrogen in its first iteration).

- As non-grid procured capacity raises unique issues and requires compliance with the provisions of the EU Delegated Acts<sup>2</sup> which lay down detailed rules on the EU definition of renewable hydrogen (and with regard to direct connection to a renewable power installation i.e., where a hydrogen facility is directly connected to a renewable asset which cannot have come into operation earlier than 36 months before the hydrogen facility and is ‘unsubsidised’), consideration must be given to how this policy interacts with national policies in a manner which diverges from existing electricity support schemes (and in the event that a grid connection is required to maintain the load of an electrolyser).
- The final Framework should clarify the link between the 11.5GW extra wind capacity commitment made at North Seas Energy Ministerial and other targets.
- A separate route to market auction process also needs to be developed to cater to both grid and non-grid. A consideration here is that, where relevant, the auction process should be used, with non-price-based criteria (for seabed/MAC auctions too).

#### 1(D) WHAT ARE YOUR VIEWS ON THE DESIGN PARAMETERS FOR THE SUCCESSOR SCHEME TO ORESS, WHAT ELSE SHOULD/SHOULD NOT BE CONSIDERED?

- The ORE Roadmap being prepared by SEAI identifies the scale and role of Floating and, in later years, Wave required to reach 2040 and 2050 targets.
- Bottom Fixed, Floating etc are at different stages of technology development and of deployment scale (a key driver of technology improvements and LCOE reductions).
- Consequently, the next ORESS Scheme must provide for separate competitive arrangements for each technology.
- In addition, there should be provision for revenue support mechanisms for pilot small scale device deployments of, say, <10MW per deployment. This is particularly urgent in the light of the forthcoming and globally pioneering 5MW Saoirse Wave pilot off Clare.
- Action items 1. and 2. In the Framework, as currently worded, are negative: there is no need to undertake a study on Floating at this late stage nor to examine the feasibility of a Floating demonstrator site. The Actions should be reworded in active, positive terms e.g., ‘Draw on the experience of other countries (e.g., Norway, France, Portugal, and Scotland) in identifying a Floating demonstrator site and developing support arrangements’.
- In this regard, the third revision to the Renewable Energy Directive (RED) imposes an obligation on Member States to promote the testing of innovative renewable energy

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<sup>2</sup> Commission Delegated Regulation, (EU) 2023/1184. Available at: [Delegated regulation - 2023/1184 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2023/1184/oj)

technology for producing, sharing, and storing of renewable energy as per Article 15<sup>3</sup>.

## 1(E) WHAT FRAMEWORKS AND/OR SUPPORTS ARE REQUIRED FOR ALTERNATE ROUTES TO MARKET SUCH AS CPPAs, POWER-TO-X PROJECTS, INTERCONNECTOR-HYBRID PROJECTS, AND EXPORT PROJECTS?

- The Framework is particularly timely considering the recent announcement by the European Commission which recommends a 90% net greenhouse gas emissions (GHG) reduction by 2040 compared to 1990 levels<sup>4</sup>.
- The core issue here is that the 37GW target will, when achieved, involve a significant capacity surplus over any likely domestic grid demands.
- In addition, hydrogen technology and applications are still at an early stage while the provision of competitively priced export electricity will be challenging.
- A new approach may be required to develop markets.
- In the first instance, joint industry/State working groups should be established to examine both 'hydrogen' and 'export' with the working groups assigned a role to develop clear plans which inter alia might include assigning substantial 'hydrogen' industry and market development responsibilities (including targets) to Enterprise Ireland/IDA and 'export' responsibilities (including targets) to EirGrid.
- Such joint working arrangements should be configured in line with the National Hydrogen Strategy actions and forthcoming Implementation Plan with departmental oversight and governance arrangements laid down, including:
  - Action 4: *'develop the commercial business models to support the scale up and development of renewable hydrogen including an initial 2 GW of offshore wind from 2030'*.
  - Action 8: *'through the development of the National Industrial Strategy for Offshore Wind, assess the feasible potential for end uses such as eFuels, decarbonised manufacturing and export of Hydrogen and its derivatives' (DETE).*
- Additionally, Action 20 of the draft Framework, namely, *'assess renewable hydrogen and renewable hydrogen transport options, including assessing viability of a hydrogen pipeline by 2040'*, requires configuration with relevant National Hydrogen Strategy actions relating to renewable hydrogen use in transport applications. Alignment is also needed in the context of the forthcoming Department of Transport (DoT) Issues Paper relating to the implementation of the Alternative Fuel Infrastructure Regulation (AFIR) which mandates that hydrogen refuelling stations be

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<sup>3</sup> [Directive - EU - 2023/2413 - EN - EUR-Lex \(europa.eu\)](#) <sup>3</sup> [Directive - EU - 2023/2413 - EN - EUR-Lex \(europa.eu\)](#)

<sup>4</sup> European Commission, Press Release, February 2024. Available at: [Recommendations for 2040 targets to reach climate neutrality by 2050 - European Commission \(europa.eu\)](#)

deployed from 2030 onwards in all urban nodes and every 200 km along the TEN-T core network.

- Further, the Net Zero Industry Act (NZIA), which sets out a range of measures to ready the EU's regulatory framework for an increase in strategic net-zero technologies (including electrolysers and fuel cells) and provides that clean technologies essential for industrial decarbonisation should not be hindered by excessive permitting rules will fall to the Department of Enterprise, Trade and Employment (DETE) to transpose, once approved by EU institutions. To ensure consistent and coherent development of policy as regards the development of a renewable hydrogen economy and new industrial demand opportunities linked to the generation of offshore wind, alignment with such forthcoming EU policy and regulation (including in relation to auction non-price criteria) and forthcoming acceleration provisions is needed to avoid further policy divergence.

#### 1(F) WHAT ADDITIONAL CAPACITIES AND RESPONSIBILITIES SHOULD BE HELD BY INDUSTRY IN THE CONTEXT OF THE PLAN-LED APPROACH?

- The current process of designing policy in isolation and then seeking feedback is not working. A new model must be considered where Government and industry work in tandem to deliver the ambition for 2040.
- To maintain effective competition, allow for attrition and secure value for money in a successor to the ORESS support scheme, it will be vital to establish and then maintain a strong pipeline of viable development opportunities by designating the full extent of the DMAPs suitable for ORE waters by no later than 2025. We would therefore urge DECC to accelerate the development of the planned DMAP roadmap (Action 5) and ensure this provides an effective opportunity to comment on detailed methodologies and criteria through which DMAPs will be established on a consistent basis, rather than only identifying them when individual regional DMAPs may be prepared. *The DMAP staffing position in DECC requires urgent attention.*
- There needs to be a dedicated mechanism for collaborating with Local Authorities (LAs) as part of the ORE development process. LA's have a responsibility for developing County Development Plans and whilst ORE will be covered in DMAPs, the respective strategic planning processes should align particularly where onshore facilities are required and will have knock-on consequences for other infrastructure development like wider roads, warehousing/storage requirements, more housing, schools, etc. This part cannot be an afterthought.

#### 1(G) HOW CAN GOVERNMENT FACILITATE A MORE COMPREHENSIVE AND STREAMLINED ENGAGEMENT PROCESS WITH DEVELOPERS TO ENSURE NATIONAL ORE TARGETS ARE DELIVERED?

- Industry recognizes the primacy of the policy maker, DECC; its limited resources; and the engagement of industry at every second meeting of the OWDTF.
- The configuration of a distinct 'Future Framework' workstream via the Offshore Wind Delivery Taskforce (OWDT) model should be considered to ensure policy

consistency and delivery of stated actions. Alignment with the actions outlined in the National Hydrogen Strategy (and forthcoming Implementation Plan) and interaction and alignment with future iterations of the National Industrial Strategy for Offshore Wind and the ORE Roadmap must be provided for to ensure robust policy frameworks. Overarching governance arrangements for implementation and responsibility for delivery of stated actions must also be laid down in clear terms. The OWDT Key Actions for 2024 should reflect such an updated approach. This 'workstream' should have industry representation at every meeting and an Action in the final version of the Framework to establish a joint industry: DECC working party to support decision-making and implementation on R&D. See also Introduction above.

- In conjunction with the establishment of the DMAP plan as a Government priority, Action 13 of the draft Framework, regarding alignment of resourcing needs across all Government Departments and agencies to deliver the Future Framework commitments, must be actioned without delay. This is a prerequisite to the delivery of robust plan-making and decision-making and is key to the achievement of the State's binding renewable energy and climate targets and net zero no later than 2050 as mandated by the Climate Action and Low Carbon Development (Amendment) Act, 2021.
- Once published, industry and stakeholder engagement regarding the SEAI Roadmap should be facilitated and a public consultation process undertaken, given that it represents a key accompanying policy to the draft Framework.
- Given tough trading conditions in global ORE, the perceived challenges of operating off Ireland etc, there is a need to utilise every opportunity to build confidence in Ireland's ORE policy. Therefore, an early priority should be to restore industry wide online workshops to brief and discuss key developments and these should be scheduled at the start of every year.
- The Seafood ORE Working Group – independent Chair, Departmental support, all possible interests meeting frequently to debate out issues etc – is a model that might serve well in other challenging ORE areas.
- The scope to *place* responsibility for developing market outlets e.g., EirGrid for interconnectors, Enterprise Ireland and IDA for hydrogen should be examined – see above also.
- Community Benefit Funds policy – DECC should interact with the Department of Rural and Community Development to maximise opportunities for policy alignment, especially in relation to enterprise, community enhancement funds etc.

## 2(A) WHAT GRID INFRASTRUCTURE SHOULD BE OF PARTICULAR FOCUS IN FACILITATING THE BUILD-OUT OF CAPACITY TO SUPPORT ORE GENERATION TARGETS?

- This is linked to DMAPs and routes to market.
- Phases 1 and 2 take priority for grid development.



- Post Phase 2, most likely DMAPs would be 1. off the West Coast 2. extension of South Coast DMAP and grid development should follow those priorities.
- DECC need to decide on the data required to hold a successful auction. Then establish how long it will take to obtain that data. The more detailed information provided the more the likelihood of a successful project being delivered.
- The need to engage industry expertise in data collection and analysis should be recognised and reference should be made to the recent decision to establish an Expert Group on Data (ref *MRIA Policy for Offshore Renewable Energy Data Surveying and Analysis* [www.mria.ie/publications](http://www.mria.ie/publications) gives the background).
- **2(B) IN RELATION TO NATIONAL SECURITY/DEPARTMENT OF DEFENCE INTERACTION WITH ORE DEVELOPMENT, ARE THERE ANY ISSUES YOU WOULD LIKE TO HIGHLIGHT?**
- The lack of a security framework for Irish ORE is a significant concern and has been raised by Banks and Insurance companies as well with the ORE industry. It was highlighted in some country-specific presentations at the recent Enterprise Ireland Offshore Wind Conference
- As a first step, the Department of Defence should step up immediately from observer status to full membership of the OWDTF and *lead* a workstream on security which inter alia involves industry.
- At this stage, the priority for ORE is to open a dialogue, via the OWDTF, with Defence on what the security issues might be, how they might be addressed and by which institutions.
- Government should be open to giving Defence the legislative mandate to lead security for ORE e.g., including amending the Maritime Security Act, 2004 which is unsuited to likely future ORE security needs.
- A copy of the MRIA submission to the Commission on the Defence Forces is attached.
- This also links to the R&D element of the Framework. For example, what technologies could be used for remote observation, un-manned/autonomous monitoring equipment, enforcement and compliance requirements, evidential standards etc. taking in remote sensing / satellite imagery etc.

**4(A) WHAT STRUCTURES, MEASURES, AND INTERVENTIONS CAN THE STATE AND STATE AGENCIES IMPLEMENT TO ASSIST IN THE DEVELOPMENT OF A LONG-TERM, SUSTAINABLE SKILLS AND WORKFORCE PIPELINE? PROVIDE ANY RECOMMENDATIONS ON WHAT THE STATE CAN DO TO PROMOTE CAREERS IN ORE ACROSS A RANGE OF EDUCATIONAL BACKGROUNDS AND MOVEMENT FROM OTHER RELEVANT SECTORS.**

- The shortage of skilled people, not just in ORE but also in maritime activities generally, is a phenomenon in all developed countries at present.
- As a first step, the OWDTF should establish a workstream, involving at least industry and the National Maritime College, to develop a long-term promotional policy for

maritime careers including ORE and to consider any specific incentives that might apply. The agreed programme should be funded by the State.

- The National Maritime College of Ireland (NMCI) is the core national capacity to support maritime skills and training and the focus should be on developing ORE appropriate courses etc *there*.
- The NMCI is not operating at capacity at present and is more than capable of meeting the national need for maritime skills, including by ORE, based on the numbers who would require basic training/micro-credential courses such as those accredited by the Global Wind Organisation (GWO), etc. The current NMCI academic programmes (level 7/Level 8) will continue to evolve and develop to meet national needs, with Level 9 programmes being created to meet industry needs. The NMCI is exploring other entry avenues into the maritime sector such as short courses or developing apprentice style courses at level 5/6 that can be delivered in conjunction with Education and Training Boards (ETBs) or Further Education and Training (FET). Students from these courses could then feed into the NMCI and complete Certificates of Competency for serving in roles at sea.
- Consideration should be given to the need for education and training capacity and outputs in other areas such as marine spatial planning, marine ecologists etc.
- A more detailed view on MRIA's views on skills etc, with an emphasis on the maritime area, is set out in the Appendix.

#### 4(B) ARE YOU AWARE OF INITIATIVES IN OTHER JURISDICTIONS OR AT A EUROPEAN LEVEL THAT WOULD BE RELEVANT TO IRELAND'S AMBITION OF BUILDING A SUSTAINABLE SKILLS AND WORKFORCE PIPELINE FOR OFFSHORE WIND?

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#### 4(C) TO WHAT EXTENT SHOULD AN EMPHASIS BE PLACED ON MULTIPURPOSE SITES FOR ORE DELIVERY, INCLUDING THE COLOCATION OF DEVICES? WHAT GOVERNMENT STRUCTURES SHOULD BE DEVELOPED TO ENCOURAGE AND FACILITATE PROGRESS IN THIS ASPECT?

- ORE is open to multiuse sites e.g., for fishing, Marine Protected Areas etc and this has been made clear from time to time e.g., at the Seafood ORE Working Group
- In terms of multiuse sites which allow for different technologies to be co-located, MRIA is supportive in principle e.g., combined Wind and Wave sites (which might only occur in deeper waters because of the minimum economic depth -c100m – required for Floating). Such an approach would have benefits for Floating considering the 'dampening' effects on the sea of an attached Wave device.
- A multi-use site approach will require deft Marine Spatial Planning e.g., regarding grid provision etc.
- In this regard, alignment of marine spatial planning in the form of statutory Designated Maritime Area Plans (DMAPs) and renewable energy clusters/hubs to be developed and supported in accordance with the evolving policy ecosystem and the forthcoming Offshore Transmission Strategy is required. The National Hydrogen

Strategy contains actions to progress work to support the development of strategic hydrogen clusters and to assess the role that integrated energy parks could play in our future energy system (Actions 6 and 13 respectively). In turn, alignment with the National Ports Policy in development and policy provisions relating to industrial clusters to be set out (?) in the soon to be published Industrial Strategy is also required.

- In addition, the draft Framework (and, indeed, the draft Planning and Development Reform Bill) makes no reference to EU acceleration provisions recently adopted pursuant to the third revision to the Renewable Energy Directive (RED) and which provides for the fast tracking of renewable energy proposals in ‘Renewable Acceleration Areas’ (RAAs) and where renewable energy deployment would be deemed to be of ‘overriding public interest’. Such accelerated permitting provisions also apply to the development of grid and storage infrastructure. The CRU has expressly noted that Ireland is currently not meeting the provisions of Article 16 of the Renewable Energy Directive (RED) relating to permitting granting processes (including planning and grid related permits) in terms of EU timelines for renewable energy projects.
- Several Member States including Germany have utilised these provisions to advance renewable energy proposals in advance of Directive transposition timelines and to ensure that renewable energy proposals are developed in time to contribute to EU renewable energy targets for 2030. The European Wind Power Action Plan requires the European Commission to issue guidance on such areas by April 2024<sup>5</sup>.
- Such provisions should be provided for in the final Framework and transposed in a timely manner and all actions to expedite delivery of renewable energy infrastructure given effect as appropriate. Specifically, the EU “Accele-RES” initiative, whereby the European Commission will support Member States in implementing the permitting provisions of the revised Renewable Energy Directive in a swift manner<sup>6</sup> should be considered.
- Consideration should be given to establishing an industry/DECC expert working group to consider this matter in more detail.
- A further matter for consideration is how one development could interact with the other. How is liability covered when one project affects another?
- Consideration of *co-locating ORE with other marine activities* requires a sorting out of the licensing ecosystem as fisheries and aquaculture do not come under the MARA regime e.g., MACs.

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<sup>5</sup> European Commission, Wind Power Action Plan COM /2023/669, October 2023. Available at: [Immediate actions for the European wind power industry \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/asset-detail/2023-10-17-wind-power-action-plan)

<sup>6</sup> The European Commission will also financially support the training of national permitting authorities and provide updated recommendations and guidance to the Member States on permitting, including on the designation of renewables acceleration areas.

(D) HOW CAN GOVERNMENT ENSURE POLICY IS KEPT IN LINE WITH EVOLVING TECHNOLOGICAL INNOVATION AND DEVELOPMENTS IN ORE DEVICES? WHAT STRUCTURES AND GOVERNMENT PROCEDURES SHOULD BE IMPLEMENTED TO FUTURE-PROOF THE ORE PLANNING PROCESS AND ACCOUNT FOR TECHNOLOGICAL SHIFTS?

- Seabed leasing and CfD auctions that utilise non priced based criteria such as technology innovation, stakeholder consultation, community ownership and investment will allow new technologies to be supported.
- A vibrant Research and Development community in ORE is the key way to ensuring the State is kept informed about technology developments and to attract FDI supply chain who are concerned about Ireland’s upper-level skills availability.
- The approach to R&D set out in the draft Framework, the draft ORE Roadmap and the draft Offshore Wind Industrial Strategy is scattered among too many agencies, too short-term and is misguided in places while not capitalizing on Ireland’s R&D achievements and facilities etc e.g., under the SFI funded MaREI programme due to end in 2026.
- A separate Research and Development policy for ORE should be developed, drawing off the various views expressed in the draft SEAI ORE Roadmap, following consultation with industry and the research community.
- The aim should be to publish it in q4, 2024.

## APPENDIX ON SKILLS AND WORKFORCE

### 1. Policy and Vision

From a strategic perspective, Ireland does not have a policy for Maritime Education and Training (MET), to include skills. The need for clear policy and a dedicated national institute is critical and Ireland had this vision 20 years ago when it conceived the National Maritime College of Ireland (NMCI) concept. While this vision needs to be reimagined for the next 15 years, the original intent was correct and the NMCI has delivered. Teagasc and BIM are good examples of how the Government support key sectors. Note that the maritime sphere does not sit anywhere at Government Department level (marine and maritime are not the same thing).

### 2. Funding

There is a significant cost to operating a facility such as the NMCI and it is critical that a sustainable funding mechanism is provided to maintain the NMCI output. Both Teagasc and BIM are funded directly to fulfil their mandates. However, the NMCI is expected to fulfil a national need and yet is funded based on an academic department within a university. The current funding model is sub-optimal and needs to be addressed. The NMCI needs a sustainable and dedicated source of funding to support its mandate.

### 3. NMCI – Designated National Centre of Excellence

The most misguided course of action would be for MET to be subsumed by the Education and Training Board’s or similar institutes in the belief that ‘everyone’ can deliver MET. It is

inevitable that costs would significantly increase and the medium to long-term usage would not be sustainable if a multitude of centres is created.

*“Building our Potential Ireland’s Offshore Wind Skills and Talent Needs”*, a report recently prepared by BVG Associates, highlights key areas that Ireland must develop to be capable of sustaining the national ambition in ORE and acknowledges the role of NMCI in this national endeavour.

Key highlights include:

- Electrical Skills – High voltage and HVDC specialists
- Management Skills – Maritime
- Engineering Skills – Marine engineering and marinisation of other skills such as mechanical engineering, etc.
- Maritime Training – across a multitude of areas
- Offshore Qualifications – across a multitude of areas
- Supply Chain Management – across a multitude of areas.

This report will facilitate the NMCI in developing future courses and supporting business cases and, in the interim, NMCI will chair the OWEP sub-group which will focus on Promoting Careers in Offshore Wind.

In terms of the facilities at the NMCI, developing the infrastructure required to support the development and delivery of alternative fuels that can be manufactured from hydrogen, namely, ammonia, methane, and methanol, is one priority. Synthetic LNG will offer a viable solution as a transition fuel over a 15-year period; however, more research will be required to develop the facilities to ensure the various fuel options are available. Battery Energy storage systems will provide another option for ships and there will be a need for ports to invest in the necessary Shore-Side Electricity (SSE) infrastructure. The NMCI will be upgrading its simulation suite to include the following ship types: Diesel Electric Dual Fuel, LNG Fuel, and an LNG Floating Storage Regasification Unit (FRSU). The upgraded simulators will allow for shipboard and shoreside training operations thereby supporting the national ports in modernising their training procedures.

The NMCI can support national ports and Government Departments in providing its full mission bridge simulators to conduct research through hydrodynamic modelling. The NMCI has done this previously in support of national and international port development and in testing proposed infrastructure solutions. The NMCI simulators provide for realistic port development testing across a wide range of variables.

#### **4. Cyber Security – Maritime Sector**

The need for cyber professionals is becoming an important issue across the maritime sector, particularly as modern shipping becomes more reliant on IT systems. Irish Ports by their nature are elements of critical national infrastructure and their security relies on physical and IT/cyber assets. It is both possible to target the physical structure and associated systems of a port, and a ships’ supporting IT systems, including navigation and engineering

systems. The ability to attack such systems has the capacity to jeopardise maritime operations, disrupt supply chain networks and severely impact national/international trade and commerce.

Threats can emerge from the port of departure or at the port of arrival. It is critical therefore that Irelands national ports have mature safety management systems and can mitigate against cyber threats and attacks that specifically target the national maritime ecosystem. Digitalisation will be a key enabler for the maritime industry, both ships and shore side support, therefore having the national ability to work collectively on sharing information based on a collaborative approach will be integral in protecting Irish ports from cyber-attacks.

The NMCI is developing modules to better prepare future mariners for the risks associated with digitalisation. The 'Internet of Things' and blockchain technology will be critical components of the future port IT infrastructure and having the knowledge and awareness of how these systems operate will be critical for ship and shoreside personnel. Having knowledge of cybersecurity standards, strategies, legal and policy instruments will be critical as these references can change quickly with the ever-changing nature of IT systems.

It will be necessary to work with EU countries in learning from others' experiences and incorporating lessons learned into the national port policy to ensure maximum protection. As an example, the NMCI is collaborating with the National Cyber Skills cluster at MTU to test scenarios on cyber ranges. These exercises range from beginner to expert level and incorporate 'Capture the Flag' scenarios which require detailed analysis to locate the threat being presented.

## **5. Electronic Data Interchange (EDI) in the Maritime Sector**

There is minimal focus on EDI across the maritime sector at present. There is no central funding for supporting such initiatives and it is a significant obstacle to attracting new talent to the national maritime sector.

It should be noted that 50% of the population live within 5km of the coast, therefore, ports have access to a large workforce. It is concerning that, despite short commutes to work and guaranteed work (ports operate 24/7), that individuals choose to ignore a satisfying career in ports and across the shipping sector. Additionally, the maritime sector is patriarchal in nature at present and there needs to be more work done on highlighting the need for more diversity across all roles, both ashore and at sea.

There is no core funding to promote careers in the maritime industry nationally and empirical evidence shows that other sectors have benefited from targeted campaigns to increase EDI. The fishing industry and agriculture industry have both worked arduously to improve their statistics, with a focus on enhancing public engagement and increased knowledge awareness – this has not been completed in the commercial maritime sector.

## **6. Visibility of Maritime Career Options**

Ireland does not have a national strategic culture which understands and values the contribution of the maritime sector to Irelands national economy. This is evident in the lack

of public policy in the area, as there is no national maritime education and training policy and there is no funding provided to advertise and attract young people to careers at sea.

As an example, both Teagasc and BIM are resourced to support their respective industries and engage nationally across primary and secondary schools, thereby highlighting careers in their respective sectors. BIM have introduced an excellent initiative called ‘The ARC’ (Aquaculture Remote Classroom) which is a mobile unit that travels around the country to raise young people’s awareness of aquaculture.

Except for the NMCI and IMDO, there is no national focus on highlighting the maritime sector (ships and shoreside) as viable career options. This has a detrimental impact on promoting career opportunities across the maritime sector, particularly as parents will be involved in the decision-making process. There is an urgent need for a perpetual national PR campaign, including school visits and information seminars. The NMCI would benefit from having a unit like the ARC to promote maritime careers across the country. At present the NMCI relies on goodwill from lecturing staff to attend career days at various locations across the country, which is not a long-term sustainable solution.

The recent ascendancy of the maritime sector through ORE and the subsequent rush to develop maritime training courses by organisations with no knowledge of the maritime sector highlights the lack of understanding and knowledge nationally. This further reinforces the MRIA’s view that there is an urgent and significant need for a comprehensive public awareness campaign to be developed, and there needs to be acknowledgement that Ireland already has a designated national centre for such training.

The future maritime sector will rely on stevedores, marine pilots, tug masters, boat handlers and a variety of other key roles that are not being replaced in a sustainable manner at present as the incentives for undertaking a career in the maritime sector can be cost prohibitive. Compare this with the subsidies and grants available to individuals in the fishing sector to undertake initial training and upskilling courses. Careers in the commercial maritime industry are not being adequately incentivised. For example, there is significant difference between the Cadet Funding Schemes used in Ireland and the UK and a short comparison is provided below:

Ireland - Cadet	United Kingdom - Cadet
<p>LNG Carrier based in UK</p> <ul style="list-style-type: none"> <li>15.7% of the cost outlay is recoverable via ISEAS*</li> </ul>	<p>LNG Carrier based in UK</p> <ul style="list-style-type: none"> <li>67 % of the cost outlay is recoverable via SMarT*</li> </ul>
<p>Cruise company in UK</p> <ul style="list-style-type: none"> <li>14% of the cost outlay is recoverable via ISEAS</li> </ul>	<p>Cruise company in UK</p> <ul style="list-style-type: none"> <li>63 % of the cost outlay is recoverable via SMarT</li> </ul>

\*ISEAS – Irish Seafarers Education Assistance Scheme

\*SMarT – Support for Maritime Training in the UK

There needs to be a greater level of support provided to the IMDO and NMCI to enhance the visibility of careers across the maritime sector, working in tandem with national ports and the Irish Chamber of Shipping.